EXHIBIT 3

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2			
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9	Attorneys for Plaintiff WAYMO LLC		
10	UNITED STATES DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA		
12	SAN FRANCISCO DIVISION		
13	WAYMO LLC	Case No. 3:17-cv-00939-JCS	
14	Plaintiff,	PLAINTIFF WAYMO LLC'S SECOND	
15	VS.	SET OF EXPEDITED REQUESTS FOR PRODUCTION PURSUANT TO	
16	UBER TECHNOLOGIES, INC.;	PARAGRAPH SIX OF MAY 11, 2017 PRELIMINARY INJUNCTION ORDER	
17	OTTOMOTTO, LLC; OTTO TRUCKING LLC	Honorable William H. Alsup	
18	Defendants.	HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY	
19	Defendants.	ATTORNETS ETES ONET	
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21	PLAINTIFF'S SECOND SET OF EXPEDITED REQUESTS FOR PRODUCTION		
22	PURSUANT TO PARAGRAPH SIX OF MAY 11, 2017 PRELIMINARY INJUNCTION ORDER (DKT. 433)		
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24	Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and the Court's order		
25	granting further expedited discovery (Dkt. 433 at 25 ¶ 6), Plaintiff Waymo LLC ("Waymo")		
26	requests that Defendants Uber Technologies, Inc. ("Uber"), Ottomotto, LLC ("Ottomotto"), and		
27	Otto Trucking LLC ("Otto Trucking") (collectively "Defendants"), produce for inspection and		
28	copying within fourteen calendar days (14) hereof the documents set forth below at the offices of		

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1	7. If DEFENDANTS' response to a particular Request is a statement that		
2	DEFENDANTS lack the ability to comply with that Request, DEFENDANTS shall specify		
3	whether the inability to comply is because the particular item or category of information never		
4	existed, has been destroyed, has been lost, misplaced or stolen, or has never been, or is no longer		
5	in DEFENDANTS' possession, custody or control, in which case DEFENDANTS shall identify		
6	the name and address of any person or entity known or believed by DEFENDANTS to have		
7	possession, custody or control of that information or category of information.		
8	8. DEFENDANTS' obligation to respond to these Requests is continuing, and their		
9	responses are to be supplemented to include subsequently acquired information in accordance with		
0	the requirements of Rule 26(e) of the Federal Rules of Civil Procedure.		
1	DOCUMENT REQUESTS		
2	REQUEST FOR PRODUCTION NO. 10:		
3	All lab notebooks belonging to LiDAR personnel or associated with LiDAR workstations.		
4	REQUEST FOR PRODUCTION NO. 11:		
5	DOCUMENTS sufficient to show how the placement of FAC lenses on laser diodes is		
6	performed.		
7	REQUEST FOR PRODUCTION NO. 12:		
8	DOCUMENTS sufficient to show the design of any assembly tools for FAC lenses.		
9	REQUEST FOR PRODUCTION NO. 13:		
20	All COMMUNICATIONS between Brian McClendon and LEVANDOWSKI.		
21	REQUEST FOR PRODUCTION NO. 14:		
22	All COMMUNICATIONS between Brian McClendon and any PERSON REGARDING		
23	OTTOMOTTO or OTTO TRUCKING before August 23, 2016.		
24	REQUEST FOR PRODUCTION NO. 15:		
25	All COMMUNICATIONS between Travis Kalanick and LEVANDOWSKI.		
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